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January 25, 2021

Hon. Edgardo Ramos
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Jose Quezada v. U.S. Wings, Inc.*
Civil Case No.: 1:20-cv-10707

Dear Judge Ramos:

Pursuant to Section (1)(E) of Your Honor's Individual Practices, this letter respectfully requests an extension of time for Defendant U.S. Wings, Inc. to respond to the Complaint in the above-referenced action without waiving any jurisdictional or other defenses it may have to the Complaint. Counsel to Plaintiff has consented to the instant request. In support of this request, the undersigned states as follows:

- (i) The original and current due date for a response to the Complaint is January 25, 2021;
- (ii) No prior request for any extension of time has been made;
- (iii) The reason for the instant request is because my firm was first retained in this matter on January 21, 2021, and the matters set forth require detailed factual and legal analysis related to personal jurisdiction, standing and the merits of Plaintiff's claims;
- (iv) Plaintiff's counsel consents to the extension requested herein.
- (v) Defendant U.S. Wings, Inc. respectfully requests, with Plaintiff's consent, a revised response date of February 29, 2021.

Thank you for your consideration, we appreciate all of Your Honor's courtesies in this matter.

Very truly yours,

WADE CLARK MULCAHY LLP
/s/ Vivian Turetsky
Vivian Turetsky
Counsel to Defendant U.S. Wings, Inc.
To: All Counsel of Record via ECF.